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IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF OREGON

UNITED STATES OF AMERICA,	)	No. 3:22-cr-00084-SI
	)	
Plaintiff,	)	DECLARATION OF COUNSEL IN
vs.	)	SUPPORT OF MOTION TO MODIFY
	)	CONDITIONS OF PRETRIAL
TONY KLEIN,	)	SUPERVISION
	)	
Defendant.	)	

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DECLARATION OF MATTHEW MCHENRY

Matthew McHenry, as counsel for the defendant, does swear under penalty of perjury that the following is true:

I make the following declaration in support of Defendant's Motion to Modify Conditions of Pretrial Supervision, specifically to allow him to possess and own firearms while on pretrial supervision.

1. I am the attorney of record for the defendant in the above-captioned case, having been appointed under the Criminal Justice Act pursuant to an order filed on March 14, 2022.

2. Mr. Klein is charged with Deprivation of Civil Rights involving sexual misconduct (21 counts) and False Declarations before a Court (4 counts).

3. Mr. Klein made his first appearance on this case on March 15, 2022. Judge You ordered Mr. Klein's release on conditions to the supervision of United States Pretrial Services. Judge You ordered Mr. Klein to not own, possess, or control any firearm or any weapon.

4. Mr. Klein arranged to have all firearms removed from his home and property prior to his first appearance, and I informed Judge You of that fact while arguing for his release to pretrial supervision. I did not request a firearm prohibition as a condition of release.

5. United States Pretrial Services did not recommend or request a prohibition on firearm ownership or possession as a condition of supervision.

6. Mr. Klein and his family regularly hunt with firearms as a means to feed themselves throughout the year.

7. Mr. Klein lives in a rural area with his family, and has received documented threats to his safety since he was indicted in the instant case.

8. Mr. Klein has no criminal record of any kind.

9. Mr. Klein is presumed innocent, and holds his rights to firearm ownership under the Second Amendment to the United States Constitution.

10. I have conferred with AUSA Katherine Rykken. The government objects to this motion.

DATED: April 13, 2022.

/s/ Matthew McHenry  
Matthew McHenry  
Attorney for Tony Klein